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February 1, 2006

BY HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
236 Massachusetts Avenue, N.E.
Suite 110
Washington, DC 20002

RECEIVED

FEB - 1 2006

Federal Communications Commission
Washington, D.C. 20541

Re: Southern Communications Services, Inc. d/b/a SouthernLINC Wireless: E911 Phase II
Quarterly Status Report; CC Docket No. 94-102

Dear Ms. Dortch:

Southern Communications Services, Inc. d/b/a SouthernLINC Wireless (SouthernLINC Wireless"), through its undersigned counsel, today submitted under separate cover its E911 Phase II Quarterly Status Report pursuant to the Commission's Order of November 3, 2005, granting in part SouthernLINC Wireless' Request for Waiver of Section 20.18(g)(1)(v) of the Commission's Rules, 47 C.F.R. § 20.18(g)(1)(v). SouthernLINC Wireless requested confidential treatment of these materials, incorporating by reference its Request for Confidentiality filed with the Commission on July 26, 2005 in conjunction with its initial Request for Waiver.

Enclosed please find an original and four copies of the redacted public version of the above-captioned E911 Phase II Quarterly Status Report. Please date-stamp the enclosed extra copy and return it in the envelope provided. If you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,


Christine M. Gill

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List ABOVE

REDACTED – FOR PUBLIC INSPECTION
**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

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FEB - 1 2006

In the Matter of)	
)	
Revision of the Commission's Rules To)	
Ensure Compatibility with Enhanced 911)	CC Docket No. 94-102
Emergency Calling Systems)	
)	
Request for Waiver By Southern)	
Communications Services d/b/a)	
SouthernLINC Wireless)	

Federal Communications Commission
Office of Secretary

To: The Commission

**SOUTHERNLINC WIRELESS E911 PHASE II QUARTERLY REPORT:
FEBRUARY 1, 2006**

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Dated: February 1, 2006

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In the Matter of)	
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Communications Services d/b/a)	
SouthernLINC Wireless)	

To: The Commission

**SOUTHERNLINC WIRELESS E911 PHASE II QUARTERLY REPORT:
FEBRUARY 1, 2006**

Pursuant to the *Order* of the Federal Communications Commission ("FCC" or "Commission") of November 3, 2005,¹ Southern Communications Services, Inc. d/b/a SouthernLINC Wireless ("SouthernLINC Wireless") hereby provides the Commission its quarterly report regarding the status of its efforts to achieve ninety-five percent penetration of automatic location identification (ALI)-capable handsets among its subscribers pursuant to Section 20.18(g)(1)(v) of the Commission's Rules, 47 C.F.R. § 20.18(g)(1)(v). SouthernLINC Wireless notes that it filed a Petition for Reconsideration and Clarification of the *Order* on December 5, 2005, which is still pending before the

¹ / *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver by Southern Communications Services, Inc. d/b/a SouthernLINC Wireless*, CC Docket No. 94-102, Order, FCC 05-188 (rel. Nov. 3, 2005) ("*Order*") (granting SouthernLINC Wireless until November 3, 2006, to achieve ninety-five percent penetration of location-capable handsets among its subscriber base and requiring the filing of quarterly status reports).

Commission, and clarifies that this quarterly status report is submitted separate from and without prejudice to its pending Petition.²

I. BACKGROUND

On July 26, 2005, SouthernLINC Wireless, a “qualified Tier III carrier” as that term is defined in Section 107 of the *ENHANCE 911 Act*,³ submitted a Request for Waiver requesting a limited extension of the Commission’s December 31, 2005, handset deployment deadline to allow SouthernLINC Wireless an additional twenty-four months to achieve ninety-five percent penetration of location-capable handsets among its subscriber base.⁴ As set forth in the Request for Waiver and subsequent filings, SouthernLINC Wireless faces numerous challenges in its efforts to achieve the required level of penetration of location-capable handsets, including (i) a latent software defect in the Motorola A-GPS-equipped handsets used by SouthernLINC Wireless subscribers that rendered all A-GPS services in these handsets unusable for E911 location in July 2004; (ii) the substantial portion of handsets assigned to enterprise or government accounts that typically have long-term equipment replacement cycles and are both reluctant and resistant to upgrading from their current handsets to new location-capable handsets; and (iii) the number of SouthernLINC Wireless subscribers who utilize and rely on the range and coverage of higher-power 1 watt and 3 watt phones and who are unwilling to upgrade to a lower-power (0.6 watt) location-capable handset, which could decrease their ability

² / Petition for Reconsideration and Clarification of SouthernLINC Wireless, CC Docket No. 94-102, filed December 5, 2005 (“Petition”).

³ / National Telecommunications and Information Administration Organization Act – Amendment, Publ. L. No. 108-494, 118 Stat. 3986 (1994) (“*ENHANCE 911 Act*”).

⁴ / Request for Waiver by SouthernLINC Wireless, CC Docket No. 94-102, filed July 26, 2005 (“Request for Waiver”).

to receive any communications services – including emergency services – in remote areas.⁵

On November 3, 2005, the Commission released its *Order* granting SouthernLINC Wireless a limited ten-month extension of the ninety-five percent handset penetration deadline and requiring SouthernLINC Wireless to file status reports on a quarterly basis. On December 5, 2005, SouthernLINC Wireless filed a Petition for Reconsideration and Clarification of the *Order*. This Petition is still pending before the Commission.

II. INFORMATION REGARDING THE STATUS OF SOUTHERNLINC WIRELESS' E911 PHASE II DEPLOYMENT EFFORTS

In accordance with the *Order*,⁶ SouthernLINC Wireless provides the Commission with the following information regarding its E911 Phase II deployment status and efforts.

A. Number and Status of Phase II Requests from PSAPs

As of the date of this report, SouthernLINC Wireless had received 80 requests for Phase II service out of a total of 298 PSAPs in its service territory. SouthernLINC Wireless has completed deployment in response to 68 of these requests, with 12 requests still pending. Additionally, three of the pending requests were received by SouthernLINC Wireless on January 31, 2006. A chart summarizing SouthernLINC Wireless' deployment of E911 Phase I and Phase II service to PSAPs is provided as Attachment A.

⁵ / See, e.g., Request for Waiver at 2 – 3; See also SouthernLINC Wireless Notice of *Ex Parte* Presentation, CC Docket No. 94-102, filed September 9, 2005; SouthernLINC Wireless Response to Request for Additional Information Supporting its Request for Waiver of the E911 Phase II Handset Deployment Deadline, CC Docket No. 94-102, filed Oct. 26, 2005 (“Supplemental Filing”).

⁶ / *Order* at ¶ 23.

All pending requests are within the six-month timeframe for completing deployment of Phase II service; however, as explained herein, one PSAP request is approaching the six-month deployment limit. Specifically, deployment has been delayed due to issues on the PSAP side regarding the necessary trunking that were learned of after the PSAP had already submitted its Phase II request to SouthernLINC Wireless (SouthernLINC Wireless was the first carrier from whom the PSAP had requested Phase II service).

Pending Phase II requests are detailed in the chart enclosed as Attachment B. Because SouthernLINC Wireless has chosen to deploy a handset-based solution to provide caller location data to PSAPs, it is currently capable of providing E911 Phase II service to any and all Phase II-capable PSAPs in its service territory.

B. Estimated Dates on Which Phase II Service Will Be Available to PSAPs Served by SouthernLINC Wireless' Network

As described above, SouthernLINC Wireless is capable of providing Phase II service to any requesting Phase II-capable PSAP in its service territory. Estimated deployment dates for pending Phase II requests are provided in the chart enclosed as Attachment B. SouthernLINC Wireless also received three requests for Phase II service on January 31, 2006, and is in the process of reviewing and evaluating these requests in order to determine their validity and develop deployment schedules.

C. Status of Coordination Efforts With PSAPs for Alternative Handset Penetration Dates

SouthernLINC Wireless remains in constant communication with all PSAPs in its territory regarding E-911 services, its ability to provide Phase I and Phase II service, and any problems that may arise that affect service availability. These communications may

be written or verbal, and they include information on SouthernLINC Wireless' ability to provide Phase II service to its customers and the degree to which its customers can benefit from Phase II capabilities. SouthernLINC Wireless' 911 services coordinator interacts with the 911 community on a regular basis, including attending meetings where she provides verbal updates on SouthernLINC Wireless' Phase II deployment status. Depending on the nature of the meeting, such information may be provided to all attendees in the form of a general announcement or may be targeted to interested parties in specific discussions. Most recently, she provided updates at the November 17, 2005, meeting of the Northwest Alabama 911 Directors and at the January 26, 2006, meeting of the Alabama NENA chapter.

SouthernLINC Wireless has also recently launched a bi-monthly communications program for Phase II-capable PSAPs in its service territory focusing on the customer handset penetration issue. Specifically, SouthernLINC Wireless is providing these PSAPs with regular updates via U.S. mail on the number of SouthernLINC Wireless customers using location-capable handsets and its progress towards the goal of ninety-five percent penetration of location-capable handsets.

In addition, SouthernLINC Wireless always provides PSAPs with written confirmation of Phase II implementation once all activities, including testing, have been completed. Going forward, these communications will also include information on the number of SouthernLINC Wireless customers using location-capable handsets and its progress towards the ninety-five percent penetration goal. These PSAPs will also receive the regular mail updates described above.

D. Efforts to Encourage Subscribers to Reflash or Upgrade Handsets

To communicate with customers about E-911 services and capabilities, SouthernLINC Wireless has launched a bill message communications plan for 2006 to provide information to its customers about E-911. A sample of the language to be used in the message appearing on customer bills is provided as Attachment C to this report. This bill message is designed to draw customers' attention to the issue of wireless E-911 service – as well as the need for an A-GPS-capable phone – and send them to a dedicated area on the SouthernLINC Wireless website for more details on E-911 services, including the availability of basic, Phase I, and Phase II services across SouthernLINC Wireless' service territory and information on which handset models are location-capable. A link to information on SouthernLINC Wireless' current handset promotions will also be featured at this location so that customers can make decisions on handset upgrades, should they choose to do so. This section of the website is scheduled to launch in early February 2006.

SouthernLINC Wireless also has a very attractive handset promotion program underway for the first quarter of 2006, which will help to encourage customers to upgrade to new, location-capable handsets. Under this program, existing customers in good standing can choose among three different location-capable phones which will be free (after a mail-in rebate) if they wish to upgrade their handsets.

E. Extent of Subscribers Having Higher-Power, Non-A-GPS Handsets

Approximately [] percent of SouthernLINC Wireless customers currently use high-power handsets which are not location-capable.

F. Percentage of Customers With Location-Capable Handsets

Approximately fifty-four percent of SouthernLINC Wireless customers currently use location-capable handsets.

G. Status in Achieving Compliance

Although SouthernLINC Wireless faces numerous challenges in its efforts to achieve ninety-five percent penetration of location-capable handsets among its subscribers, it is committed to achieving full compliance as quickly as possible and has made significant progress towards this goal. As a result of the variety of outreach, promotional, and marketing efforts it has undertaken, SouthernLINC Wireless has succeeded in increasing its level of penetration of location-capable handsets from approximately forty-three percent on October 31, 2005, to approximately fifty-four percent as of January 31, 2006. SouthernLINC Wireless is now building on these positive results in order to further accelerate customer adoption of location-capable handsets through additional promotional and outreach measures such as those described in Section II.D. above.

SouthernLINC Wireless believes that it will be able to achieve the ninety-five percent penetration level and will continue to put forth substantial effort and resources into doing so. However, SouthernLINC Wireless, despite its best efforts, is not on schedule to achieve this level by the revised deadline of November 3, 2006.

Consequently, as set forth in its pending Petition for Reconsideration and Clarification, SouthernLINC Wireless does not believe that the ten-month extension granted by the

Commission provides sufficient time in light of the extraordinary circumstances of its situation.⁷

III. CONCLUSION

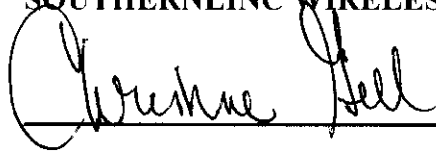
As demonstrated above, SouthernLINC Wireless is continuing to put forth substantial effort and resources into migrating as much of its subscriber base as possible to location-capable handsets, and it is committed to achieving full compliance with the Commission's handset penetration requirement as quickly as possible.

⁷ / Petition at 16 – 18.

REDACTED – FOR PUBLIC INSPECTION

Respectfully submitted,

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Dated: February 1, 2006

Attachment A

PSAP Deployment of E911 Phase I and Phase II Services

911 Deployments

Status as of January 31, 2006		Phase 1 Requests					Phase 2 Requests				
911 Implemen tation	Total PSAPs	Total Rec'd	Total Pending	Total Deployed	2006 Deployme nts	Total Past Deployment Deadline	Total Rec'd	Total Pending	Total Deployed	2006 Deployments	Total Past Deployment Deadline
AL	83	64	1	63	0	0	38	4	34	1	0
FL	12	10	0	10	1	0	9	1	8	1	0
GA	179	69	4	65	1	0	28	6	22	0	0
MS	24	10	1	9	1	0	5	1	4	1	0
Total	298	153	6	147	3	0	80	12	68	3	0

Attachment B

Pending E911 Phase II PSAP Requests

Phase 2 Outstanding Request Status as of 1/31/2006 10:20 AM CST

State	PSAP Name	P2 6 Mo Deployment Due Date	Scheduled P2 Deployment Date	Notes
AL	Barbour County AL 911	28-May-06	Week of 2/6/2006	
AL	Escambia County AL 911	4-Apr-06	6-Mar-06	PSAP not ready until first week in March 2006
AL	Mt Brook AL, City of	3-Jul-06	1-Feb-06	
AL	Russell County AL 911	19-Jul-06	Week of 2/13/2006	Awaiting confirmation from Director
FL	Santa Rosa County FL 911	26-Jul-06	TBD	Request received this week
GA	Appling County GA 911	4-Jul-05	Week of 2/6/2006	PSAP not ready until first week in February 2006
GA	Cook County GA 911	9-Mar-06	15-Feb-06	PSAP not ready until mid-February 2006
GA	Jefferson County GA 911	20-Jul-06	TBD	Request received this week
GA	Muscogee County/City of Columbus 911	14-Jul-06	Week of 2/6/2006	
GA	Thomas County GA 911	10-May-06	Week of 2/6/2006	PSAP not ready until first week in February 2006
GA	Worth County GA 911	30-Apr-06	Week of 2/13/2006	Awaiting confirmation from Director
MS	Stone County MS 911	7/24/2006	TBD	Request received this week

Attachment C

Sample Customer Bill Message

Bill Message

Safety Continues to be a Priority for SouthernLINC Wireless!
SouthernLINC Wireless is expanding the area in our footprint where Enhanced 911 (E911) service is available. E911 service provides emergency response agencies important information that helps them dispatch assistance to you, such as the telephone number from which a call to 911 is placed. In areas where the emergency response agencies have updated their equipment, they can also receive the approximate location of the caller. This information can be critical to obtaining help rapidly, but it is available only if your phone has A-GPS-capabilities. Visit your local SouthernLINC Wireless store or dealer today to make sure that you have an A-GPS-capable phone. To learn what areas E911 is now available in our SouthernLINC Wireless footprint, visit www.southernlinc.com.